



Via Electronic ECFS Filing

February 27, 2009

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

RE: 2008 CPNI Certification, EB-06-36

Dear Ms. Dortch:

Pursuant to section 64.2009(e) of the Commission's rules<sup>1</sup> and the Commission's *Public Notice*, DA 09-9, dated January 7, 2009 in the above-captioned matter, TransCard, LLC f/k/a Innovative Processing Solutions, LLC,<sup>2</sup> hereby submits its compliance certificate and this statement explaining how the Company's operating procedures ensure compliance with these regulations.

By the attached Certificate, I hereby certify to the Commission that TransCard, LLC has established, and strictly follows, policies and operating procedures to fully comply with applicable provisions of section 64.2001 *et seq.* of the Commission's rules governing Customer Proprietary Network Information ("CPNI").

TransCard, LLC has established strict policies, which expressly prohibit release of CPNI to any employee not directly involved in the provision of service to the customer, subject to disciplinary action and termination of employment. Each employee receives an initial CPNI protection briefing and annual CPNI protection requirement reviews thereafter. All employees are strictly held to non-disclosure obligations.

CPNI data is accessible only to those employees with a "need to know" for purposes of serving current subscribers. The Company does not sell, or otherwise release, CPNI to other entities under any circumstances. TransCard, LLC has no affiliates. All contact with customers is documented through retention of electronic copies of communications and retention of any scripts used if contacting subscribers telephonically, for a minimum period of one year. All sales or marketing campaigns initiated by the Company require my approval; I am responsible for ensuring that each campaign strictly complies with the Commission's CPNI regulations.

Questions regarding this matter may be directed to me.

Sincerely,

TRANSCARD, LLC

  
Kevin Caylor

Assistant Secretary and Treasurer

<sup>1</sup> 47 C.F.R. §64.2009(e).

<sup>2</sup> The Company's name was changed in January 2009.

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**  
**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for calendar year 2008.

Date filed: February 27, 2009

Name of company covered by this certification: TransCard, LLC f/k/a Innovative Processing Solutions, LLC

Form 499 Filer ID: 813030

Name of signatory: Kevin Caylor

Title of signatory: Assistant Secretary and Treasurer

I, Kevin Caylor, certify that I am an officer of the Company named above, and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

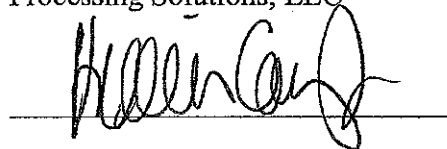
Attached to this certification is an accompanying letter statement explaining how the Company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken, nor been compelled to take, any actions<sup>1</sup> against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

TRANSCARD, LLC f/k/a Innovative  
Processing Solutions, LLC

Signed

A handwritten signature in black ink, appearing to read 'Kevin Caylor', is written over a horizontal line.

Kevin Caylor  
6125 Preservation Drive  
Chattanooga, TN 37416  
Telephone: 423.553.5200  
Facsimile: 423.954.9973

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<sup>1</sup> Proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers.